

## **Element Performance Inspection (EPI)**

### **3.1.11 Computer Based Record Keeping System (OP)**

**Purpose of this Element (Air Carrier's responsibility):**

To prepare and maintain the Air Carrier's records in an electronic format.

**Objective (FAA responsibility):**

To determine if the Air Carrier's Computer Based Record Keeping System continues to provide accurate, timely, and reliable records.

**Specific Instructions for this EPI:**

To accomplish this EPI, the inspector should familiarize himself/herself with the Air Carrier's computer based record keeping software and obtain access to the system. This EPI should be performed in conjunction with the related EPIs.

**Question 1.1,** The inspector should ensure that the Computer Based Record Keeping System contains at least the listed records.

**Question 1.2,** For clarification purposes, the (domestic and flag) refers to the dispatcher portion of the question only.

**Question 1.5,** Many air carriers retain radio communication records in a variety of formats that include word processing, spreadsheets, and ACARS data.

**Related EPIs:**

- 3.1.4 Operational Control (OP)
- 3.2.1 Dispatch / Flight Release (OP)
- 3.2.2 Flight / Load Manifest / Weight and Balance Control (OP)
- 4.2.3 Training of Flight Crewmembers (OP)
- 4.2.4 Training of Flight Attendants (OP)
- 4.2.5 Training of Dispatchers (OP)
- 4.2.6 Training of Station Personnel (OP)
- 4.2.7 Training of Check Airmen and Instructors (OP)
- 4.2.8 Simulators / Training Devices (OP)
- 4.2.9 Outsource Crew Training (OP)
- 4.2.10 Aircrew Designated Examiner (ADE) Program (OP)
- 4.2.11 Training of Flight Followers (OP)
- 4.3.1 Pilot Operating Limitations / Recent Experience (OP)
- 4.3.2 Appropriate Airmen / Crewmember Checks and Qualifications (OP)
- 4.3.3 Advanced Qualification Program (AQP) (OP)
- 6.1.1 Scheduling / Reporting System (OP)
- 6.1.2 Flight Crewmember Flight / Duty / Rest Time (OP)
- 6.1.3 Flight Attendant Duty / Rest Time (OP)
- 6.1.4 Dispatcher Duty / Rest Time (OP)

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*To meet this objective, the inspector will accomplish the following tasks (at the inspection locations where applicable):*

1. Review the FAA Guidance and Specific Regulatory Requirements (SRR) included in the supplemental information section of this EPI.
2. Review the associated SAI, with emphasis on the Controls Attribute section.
3. Review policies and procedures related to the Computer Based Record Keeping System.
4. Discuss Computer Based Record Keeping System procedures with appropriate personnel.
5. Observe personnel using the Computer Based Record Keeping System.
6. Review and assess computer based records.

*To meet this objective, the inspector will answer the following questions:*

1. Were the following performance measures met:

*1.1 Did crewmember and dispatcher records contain evidence of proficiency and route checks, airplane and route qualification, training, any required physical examinations, flight duty, and rest time? [SRR 121.683(a)(1)] [SRR 121.683(b)]*

☐ YES      If no, explain:  
☐ NO

*1.2 Were records kept at least six months for each action taken concerning the release from employment, or physical or professional disqualification of any dispatcher (domestic and flag only) or flight crewmember? [SRR 121.683(a)(2)] [SRR 121.683(b)]*

☐ YES      If no, explain:  
☐ NO

*1.3 For domestic and flag operators, were the records required in this section (Load manifest, dispatch release, flight plan) retained for at least three months? [SRR 121.695(b)]*

☐ YES      If no or N/A, explain:  
☐ NO  
☐ N/A      CONDUCTS SUPPLEMENTAL OPERATIONS ONLY

*1.4 For Air Carriers conducting supplemental operations, were required records (load manifest, flight release, airworthiness release, pilot route certification, and flight plan) retained at the principle base of operations for at least three months? [SRR 121.697(e)(2)]*

☐ YES      If no or N/A, explain:  
☐ NO  
☐ N/A      CONDUCTS DOMESTIC AND FLAG OPERATIONS ONLY

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1.5 For domestic or flag operators, were records of enroute radio contact between the certificate holder and its pilots kept for at least thirty days? [SRR 121.711]	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	If no or N/A, explain:
1.5.1 Were the records accurate?	<input type="checkbox"/> YES <input type="checkbox"/> NO	If no, explain:
1.6 Did the Computer Based Record Keeping System provide computer virus protection?	<input type="checkbox"/> YES <input type="checkbox"/> NO	If no, explain:
1.7 Were the records frequently backed up as appropriate to the operator's level of operation and system complexity?	<input type="checkbox"/> YES <input type="checkbox"/> NO	If no, explain:
1.8 Were backed up records stored at a separate facility?	<input type="checkbox"/> YES <input type="checkbox"/> NO	If no, explain:
1.9 Did required records contain an authorized electronic signature? [SRR's 121.401(c) 121.663, 121.665]	<input type="checkbox"/> YES <input type="checkbox"/> NO	If no, explain:
2. Were the written procedures adhered to for the Computer Based Record Keeping System?	<input type="checkbox"/> YES <input type="checkbox"/> NO	If no, explain:
3. Were the identified controls adhered to for the Computer Based Record Keeping System?	<input type="checkbox"/> YES <input type="checkbox"/> NO	If no, explain:

**SUPPLEMENTAL INFORMATION**

**SRRs:**

- 14 CFR 121.401 (c), “Training Programs: General.”
- 14 CFR 121. 663, “Responsibility for Dispatch Release: Domestic and Flag Operations.”
- 14 CFR 121.665, “Load Manifest.”
- 14 CFR 121.683 (a-c), “Crewmember and Dispatcher Record.”
- 14 CFR 121.695 (b), “Disposition of load manifest, dispatch release, and flight plans: Domestic and flag operations.”
- 14 CFR 121.697 (b, e), “Disposition of load manifest, flight release, and flight plans: Supplemental Operations.”
- 14 CFR 121.711, “Communication Records: Domestic and Flag Operations.”

**Other CFRs and FAA Guidance:**

- FAA Order 8400.10, Vol. 1, Chap. 4, Sec. 6, “Five-Step Approval Process.”
- FAA Order 8400.10, Vol. 3, Chap. 11, Sec. 4, “Computer-Based Record Keeping.”
- AFS 220 Policy Letter, “Computer-Based Record Keeping System.”
- Refer to Advisory Circulars using a search engine (such as ATP Navigator or Summit).